

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

UNITED STATES OF AMERICA

v.

ZHI TIAN LANG,

Defendant

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CRIMINAL NO. PJM-19-0433

RESPONSE TO EMERGENCY MOTION TO AMEND PRETRIAL CONDITIONS

The Defendant has filed a motion seeking permission to reside with his mother in a hotel room during the Christmas holiday period (ECF 13). The Defendant submits that he will abide by all of his release conditions, that his mother will supervised him in accordance with all release conditions and notify the Court immediately if the Defendant violates any condition of release or disappears, and that the Defendant will stay in a hotel approved by PreTrial.

The Government does not object to the requested relief, so long as the Defendant's mother signs a document setting forth the release conditions and her obligations to enforce them. The document should be filed with the Court. There should be no ambiguity regarding the conditions that the Defendant's mother will be expected to enforce.

Respectfully submitted,

Robert K. Hur
United States Attorney

By: /s/ Joseph R. Baldwin
Joseph R. Baldwin
Assistant United States Attorney